

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

VALVETECH, INC.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 6:17-cv-06788-FPG-MJP
AEROJET ROCKETDYNE, INC.,	:	
	:	
Defendant.	:	

**PLAINTIFF VALVETECH, INC.'S NOTICE OF MOTION FOR PERMANENT
INJUNCTION**

PLEASE TAKE NOTICE that, upon the memorandum of law filed concurrently with this motion, Plaintiff ValveTech, Inc. (“ValveTech”) will move this Court before the Hon. Frank P. Geraci, Jr., at the United States District Court, 100 State Street, Rochester, New York 14614, for an Order granting ValveTech a permanent injunction against Defendant Aerojet Rocketdyne, Inc., (“Defendant”). As laid out more fully in ValveTech’s accompanying memorandum, ValveTech will move this Court for a permanent injunction enjoining the use of ValveTech Proprietary Information and/or derivatives thereof for purposes of qualification of Aerojet’s engine, requiring Aerojet to return all ValveTech Proprietary Information to ValveTech, requiring deletion of all ValveTech Proprietary Information shared with any outside entity and certification thereof, granting forensic discovery into the locations of all ValveTech Proprietary Information within Aerojet’s files with costs borne by Aerojet, and for such other and further relief as may be just and proper.

In support of this motion, ValveTech will rely on the accompanying memorandum and exhibits cited therein, declaration of John D. Esterhay, and any other materials that the Court requests or deems appropriate. The grounds for this motion are more fully set forth in the memorandum of law that is submitted in support of this motion.

PLEASE TAKE FURTHER NOTICE that ValveTech reserves all rights to file and serve reply papers pursuant to Local Rule 7(a)(1). ValveTech hereby requests oral argument on this motion.

Dated: December 27, 2023

Respectfully submitted,

By: /s/ John D. Esterhay

Laurie A. Vahey
Vahey Getz LLP
144 Exchange Blvd., Suite 400
Rochester, New York 14614
Tel: 585-262-5130
lvahey@vaheygetz.com

Kevin J. Patariu
John D. Esterhay
Miguel J. Bombach
Abigail A. Gardner
Perkins Coie LLP
11452 El Camino Real, Suite 300
San Diego, CA 92130-2080
Telephone: (858) 720-5700
Fax: (858) 720-5799
KPatariu@perkinscoie.com
JEsterhay@perkinscoie.com
MBombach@perkinscoie.com
AGardner@perkinscoie.com

Attorneys for Plaintiff
VALVETECH, INC.